

RUIZ LAW FIRM
1055 Whitney Ranch Drive, Suite 110
Henderson, NV 89014
702.850.1717 / 702.850.1716 (fax)

LAWRENCE RUIZ, ESQ.
Nevada Bar No. 11451
RUIZ LAW FIRM
1055 Whitney Ranch Drive, Suite 110
Henderson, NV 89014
Phone: (702) 850.1717
Fax: (702) 850.1716
lawrence@lmruizlaw.com
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAMIE HATCH,

Plaintiff,

vs.

COUNTRY PREFERRED INSURANCE
COMPANY, a Georgia Foreign Insurance
Company; DOES 1-10; and ROE Entities 11
through 20, inclusive jointly and severally,

Defendants.

Case No.: 2:23-cv-01705-JAD-BNW

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(1st Request)**

COUNTRY PREFERRED INSURANCE
COMPANY, an Illinois Corporation,

Counterclaimant,

vs.

JAMIE HATCH,

Counter- Defendant.

In accordance with Local Rules of Practice for the United States District Court for the District of Nevada ("LR") 26-4, Plaintiff Jamie Hatch ("Plaintiff"), by and through his counsel of record, LAWRENCE RUIZ, ESQ. of the RUIZ LAW FIRM, and Defendant Country Preferred Insurance Company ("Defendant"), by and through their counsel of record, GINA M.

MUSHMECHE, ESQ. of KRAVITZ, SCHNITZER, JOHNSON & WATSON, CHTD., hereby stipulate and agree to an extension of all remaining discovery deadlines by sixty (60) days. The parties propose the following revised discovery plan (new information in bold italics):

Pursuant to Local Rule 6-1(b), the Parties hereby aver that this is the first such discovery extension requested in this matter. Further: 1) there is no danger of prejudice as the extension is stipulated by the Parties; 2) a sixty (60) day extension will not impact a trial date because the same has not been scheduled; and 3) the requested extension is made in good faith by both Parties. *Pioneer Investment Services v. Brunswick Associate 's, Ltd.*, 507 U.S. 380, 395 (1993).

I.

DISCOVERY COMPLETED TO DATE

1. Plaintiff served his Initial Disclosure Pursuant to FRCP 26 on December 20, 2023;
2. Defendant served its Initial Disclosure Pursuant to FRCP 26 on December 26, 2023;

II.

DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF DISCOVERY

Discovery to be completed includes:

1. Deposition of Plaintiff.
2. Deposition of Defendant's FRCP 30(b)(6) representative(s).
3. Deposition of Plaintiff's Expert.
4. Deposition of Defendant's Expert.
5. Depositions of fact witnesses.
6. Depositions of Plaintiff's treating medical providers.
7. Depositions of Defendant's employees.

8. FRCP 26(a)(2) designation of initial and rebuttal expert witnesses.

9. Depositions of initial and rebuttal expert witnesses.

Additional written discovery and depositions as the Parties deem necessary.

The Parties assert, pursuant to Local Rule 6-1, that good cause exists for the requested extension.

III. REASONS WHY DISCOVERY WAS NOT COMPLETED WITHIN TIME SET BY DISCOVERY PLAN

The Discovery Plan and Scheduling Order was not filed in this matter until December 4, 2023. With the onset of the holidays, it made scheduling depositions difficult. For the month of January, counsel for Defendant had to prepare for and attend trial in another matter, which she is currently still in.

Further, the Parties wish to investigate this case by completing the depositions of important witnesses prior to initial expert disclosures in an effort to determine if resolution of this matter may be reached prior to incurring fees and costs associated with disclosing experts and their respective opinions. The parties have entered into this agreement in good faith and not for purposes of delay.

IV. DISCOVERY DEADLINES

Discovery cutoff:	April 3, 2024
Amending the pleadings or adding parties:	Closed
Initial expert disclosures:	February 5, 2024
Rebuttal expert disclosures:	March 4, 2024
Dispositive motions:	May 3, 2024
Joint Pre-Trial Order, if no Dispositive Motions	June 3, 2024

RUIZ LAW FIRM
 1055 Whitney Ranch Drive, Suite 110
 Henderson, NV 89014
 702.850.1717 / 702.850.1716 (fax)

V.
[PROPOSED] NEW DISCOVERY DEADLINES

Discovery cutoff:	<i>June 3, 2024</i>
Amending the pleadings or adding parties:	<i>Closed</i>
Expert Disclosures:	<i>April 5, 2024</i>
Rebuttal Disclosures:	<i>May 3, 2024</i>
Dispositive motions:	<i>July 2, 2024</i>
Joint Pre-Trial Order, if no Dispositive Motions	<i>August 2, 2024</i>

The Parties aver that this request for extension of discovery deadlines is made by the Parties in good faith and not for the purpose of delay.

APPROVED AS TO FORM AND CONTENT.

RUIZ LAW FIRM

KRAVITZ, SCHNITZER, JOHNSON & WATSON, CHTD.

/s/ Lawrence Ruiz

/s/ Gina M. Mushmeche

 LAWRENCE RUIZ, ESQ.
 Nevada Bar No. 11451
 1055 Whitney Ranch Drive, Suite 110
 Henderson, NV 89014
Attorney for Plaintiff/Counter-Defendant

 GINA M. MUSHMECHE, ESQ.
 Nevada Bar No. 10411
 8985 S. Eastern Avenue, Suite 200
 Las Vegas, NV 89123
Attorney for Defendant/Counterclaimant

IT IS SO ORDERED:



 UNITED STATES MAGISTRATE JUDGE

Dated: 2/5/2024

Re: Hatch v. Country

Gina Mushmeche <gmushmeche@ksjattorneys.com>

Fri 2/2/2024 2:08 PM

To: Tammy Wagner <Tammy@lmruizlaw.com>

Cc: Lawrence Ruiz <lawrence@lmruizlaw.com>; Courtney Cruse <CCruse@ksjattorneys.com>

Confirmed. Permission to sign.

Sent from my iPhone

On Feb 2, 2024, at 2:07 PM, Tammy Wagner <Tammy@lmruizlaw.com> wrote:

Sorry, can I confirm that I have your permission to use your e-signature?

Thank you,

Tammy A. Wagner, ACP

Advanced Certified Paralegal/Office Administrator

<Outlook-wfpie3yc>

1055 Whitney Ranch Drive, Suite 110

Henderson, NV 89014

702.850.1717 (p)

702.850.1716 (f)

<Outlook-vegas stro>

<Outlook-3000o23p.png>

<Outlook-ot5h5o1l.png>

This E-Mail has been sent as a confidential communication in furtherance of and for the purpose of facilitating the rendition of professional legal services. If you are not the addressee or the intended recipient, do not read this email. This email is protected by the attorney-client privilege and the work product doctrine. This e-mail is not intended for release to opposing parties, opposing counsel or any other third person or entity. DO NOT PRODUCE A COPY OF THIS E-MAIL IN DISCOVERY. If you have received this message in error, or are not the named or intended recipient (s), please immediately notify the sender at (702) 850.1717 or tammy@lmruizlaw.com and delete this email message and any attachments from your workstation or network mail system.